

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

ROY ORON, an individual; MAAYAN
MARZAN (aka MAAYAN ALMOG), an
individual; CLICKOMY, LTD., an Israeli
company; RASHEED ALI, an individual;
PETER BRADFORD, an individual; CASH
NETWORK, LLC, a Nevada limited liability
company; JEFFREY GILES, an individual;
DALE BROWN, an individual; FIRST
IMPRESSION INTERACTIVE, INC., an Illinois
corporation; and JOHN DOES 1–10,

Defendants.

No. 2:19-cv-00523-RSM

STIPULATED PERMANENT
INJUNCTION AS TO
DEFENDANTS CASH
NETWORK, LLC, RASHEED ALI,
AND PETER BRADFORD AND
PROPOSED ORDER

NOTED FOR CONSIDERATION:
March 11, 2021
without oral argument

STIPULATION

Plaintiff Amazon.com, Inc. and Defendants Cash Network, LLC, Rasheed Ali, and
Peter Bradford (collectively “Parties”), by and through their respective counsel of record, notify
the Court that the parties have reached a settlement of all claims in this matter. Pursuant to the
terms of that settlement, the Parties stipulate and agree to entry of the permanent injunction
below.

1 DATED: March 11, 2021

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*Attorneys for Defendants Cash Network,
LLC, Rasheed Ali, and Peter Bradford*

PERMANENT INJUNCTION

Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that Defendants Cash Network, LLC, Rasheed Ali, and Peter Bradford, and their respective directors, shareholders, officers, employees, agents, successors and assigns, and all others in active concert or participation with them, are enjoined and restrained from:

1. Using counterfeit versions of any trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.) as of this injunction's entry date with any advertising, marketing, offer for sale, promotion, display, publication, website, voicemail, email, or software;

2. Using any false designation of origin or false or misleading description or false or misleading representation that can or is likely to lead the trade or public or individuals erroneously to believe that any website, voicemail, email, advertising, or other marketing materials has been produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Amazon, when such is not true in fact;

3. Engaging in any other activity constituting an infringement or dilution of any trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.), or of the Amazon parties' rights in, or right to use or to exploit, such trademarks or services marks for the pecuniary benefit of Peter Bradford, Rasheed Ali, or Cash Network, LLC; and

4. Knowingly and materially assisting any other person or business entity in engaging in or performing any of the activities listed above.

Additionally, the Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the Parties' settlement agreement and this Stipulated Permanent Injunction.

DATED THIS ____ day of _____, 2021.

The Honorable Ricardo S. Martinez
CHIEF UNITED STATES DISTRICT JUDGE